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**From:** Donald Shoup  
**Sent:** Tuesday, January 21, 2014 4:26 PM  
**To:** CEQA Guidelines  
**Subject:** LOS Alternatives

Question 3 on page 13 of the *Preliminary Evaluation of Alternative Methods of Transportation Analysis* asks,

“SB 743 provides that parking impacts of certain types of projects in certain locations shall not be considered significant impacts on the environment. Where that limitation does not apply, what role, if any, should parking play in the analysis of transportation impacts?”

Parking should play a important new role in the analysis of transportation impacts for all projects. Here are my recommendations:

1. The analysis should consider the effect of the parking supply on the number of vehicle trips that a project will create, and the environmental impacts of these trips. On page 195 of *The High Cost of Parking*, I estimated that each new parking space on the UCLA campus (and by extension in Los Angeles) creates 727 new VMT per space per month, and that this new travel will create the following new tailpipe emissions per parking space per month: 1.3 pounds of CO, 13.8 pounds of NOx, 0.03 pounds PM10, and 0.07 pounds of SOx.
2. The analysis should consider the pricing of on-street parking near a project. In Chapter 14 of *The High Cost of Free Parking*, I estimated that cruising for underpriced curb parking in the 15 blocks of Westwood Village in Los Angeles creates about 950,000 vehicle miles of unnecessary travel per year, equivalent to 38 trips around the earth or four trips to the moon. Cruising those 950,000 miles per year in Westwood wastes 47,000 gallons of gasoline and produces 730 tons of carbon dioxide per year. If all this happens in one small business district, imagine the cumulative effect of cruising for underpriced curb parking throughout California.
3. The analysis should consider whether California’s parking cash out law will be enforced in the project. The Environmental Impact Report for a new office building in Los Angeles includes this commitment on page 277 of the Transportation Study: "Any employer of 50 persons or more within the Modified Project will be required to offer a parking cash-out option to its employees, and all employers regardless of size within the Modified Project will be encouraged to participate in the program. This will help to further incentivize alternative modes of travel to and from the Project Site."

The EIR is available at this

link: <http://cityplanning.lacity.org/eir/CenturyCityCenter/FEIR/index.html>

Donald Shoup